

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA-NEWPORT NEWS DIVISION**

MALIK JONES as assignee of DEON HARKINS., Plaintiff,)	JURY TRIAL DEMANDED
)	
)	
)	
v.)	Case No.
)	
CREDIT MANAGEMENT CONTROL., CREDIT CONTROL CORPORATION., Defendant.)	
)	
)	

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual and statutory damages brought by Plaintiff, Deon Harkins, an individual consumer, against Defendant, Credit Management Control., (“CMC”), Defendant, Credit Control Corporation, (“CCC”) for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et seq.* (hereinafter “FDCPA”), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

II. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331. Venue in this District is proper in that the Defendants transacts business in Newport News, Warrick County, Virginia, and the conduct complained of occurred in Hampton, Hampton City, Virginia.

III. PARTIES

3. Plaintiff Deon Harkins (hereinafter “Mr. Harkins”) is a natural person residing in Hampton, Hampton City, Virginia. Mr. Harkins is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C §1692a(3).
4. Party Malik Jones (hereinafter “Mr. Jones”) is a natural person residing in Newport News, Warrick County, Virginia. Mr. Jones has been assigned 100 percent of these claim(s) above also is Attorney-In-Fact pursuant to Virginia Stat. tit. § 64.2-1633.
5. Upon information and belief, Defendant Credit Management Control., is a Wisconsin corporation with its principal place of business located at 1263 Main Street, Suite 212, Green Bay, WI 54305.
6. Upon information and belief, Defendant Credit Control Corporation is a Virginia based corporation with its principal place of business located at 11821 Rock Landing Dr, Newport News, VA 23606.

7. Defendant Credit Management Control., Credit Control Corporation., (hereinafter referred to as “Debt Collector”) is a “debt collector” as defined by the FDCPA, 15 U.S.C 1692a(6).

IV. FACTS OF THE COMPLAINT

8. Defendant, Credit Control Corporation., Credit Management Control., (hereinafter referred to as “Debt Collector”) is a “debt collector” as defined by the FDCPA, 15 U.S.C 1692a(6).
9. Around August 10, 2021, Mr. Hawkins applied for credit and was denied.
10. On or about October 4th, 2021, upon receiving notice of why Mr. Hawkins was denied. Mr. Hawkins checked his report on “credit karma.”
11. On the report, Mr. Harkins observed a tradeline from Debt Collector.
12. Debt Collector (Credit management Control.,) furnished a trade line of \$1,546, allegedly owned to Whipple Tree Emergency.
13. Debt Collector (Credit Control Corporation.,) furnished a trade line of \$526, allegedly owned to Whipple Tree Emergency.
14. Also on October 4, 2021 Plaintiff made a dispute via telephone, however on December 4, 2021, Plaintiff re-checked his credit reports and Debt Collector had several communications with the consumer reporting agencies and Debt Collector failed to communicate that the debt was disputed by Plaintiff.

15. Debt Collector's publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of Mr. Harkins and caused sever humiliation, emotional distress, mental anguish, and damage to his FICO scores.

V. FIRST CLAIM FOR RELIEF
(Defendant Credit Management Control., Credit Control Corporation.,)
15 U.S.C. §1692e(8)

16. Mr. Harkins re-alleges and reincorporates all previous paragraphs as if fully set out herein.

17. The Debt Collector violated the FDCPA.

18. The Debt Collector's violations include, but are not limited to, the following:

(a) The Debt Collector violated 15 U.S.C § 1692e(8) of the FDCPA by failing to disclose to the consumer reporting agencies that the alleged debt was in dispute by Mr. Harkins.

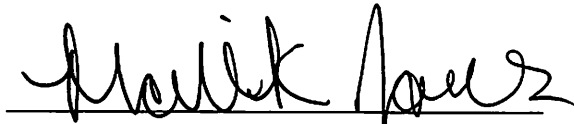
19. As a result of the above violations of the FDCPA, the Defendants are liable to the Mr. Harkins actual damages, statutory damages and cost.

VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff Deon Harkins respectfully demands a jury trial and request that judgment be entered in favor of Plaintiff and against the Debt Collector for:

- A. Judgement for the violations occurred for violating the FDCPA:
- B. Actual damages pursuant to 15 U.S.C 1692k(1)(2);
- C. Statutory damages pursuant to 15 U.S.C 1692k(2);
- D. Cost pursuant to 15 U.S.C 1692k(3);
- E. For deletion and further relief as the Court may deem just and proper.

Deon Harkins

A handwritten signature in black ink, appearing to read "Malik Jones", written over a horizontal line.

Malik Jones Attorney-In-Fact Virginia Stat. § 64.2-1633.
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